FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION

Aluminum Finishing Corporation
9850 East 30th Street
Indianapolis, Indiana 46229

Aluminum Finishing Corporation (herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordancewith 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-7881-00127	
Issued by: Robert F. Holm, PhD, Administrator Environmental Resources Management Division	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source and fabricates, anodizes and surface coats miscellaneous metal parts primarily for the architectural products manufacturing industry.

Responsible Official:	**Kenneth Asam**
Source Address:	**9850 East 30th Street, Indianapolis, Indiana 46229**
Mailing Address:	**9850 East 30th Street, Indianapolis, Indiana 46229**
SIC Code:	**3479**
County Location:	**Marion County**
County Status:	**Nonattainment for PM**
Source Status:	**Federally Enforceable State Operating Permit (FESOP)** **Minor Source under PSD**

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(1) Miscellaneous metal parts surface coating of various sheet metal products conveyed through four (4) paint spray booths contained within a total enclosure Paint Tunnel. The Paint Tunnel is maintained under negative pressure, in relation to the surrounding plant, at a minimum average facial velocity of 200 feet per minute air infiltration into the paint tunnel through all natural draft openings. Volatile Organic Compound (VOC) emissions are controlled by a Thermal Oxidizer.

Surface coating in the Paint Tunnel consists of two (2) Binks automated paint spray booths for primer application, identified as Emission Unit ID B-1 and B-2, and two (2) Telkamp manual application booths identified as Emission Unit ID B-5 and B-6 for coatings applications. Electrostatic air atomization is the spray application method. Each Emission Unit ID is equipped with dry filters for over spray and Particulate Matter (PM) control. Combined total maximum surface coating capacity of six (6.0) gallons of primers/coatings per hour at an average conveyor line speed of six (6.0) feet per minute. Installed in 1989.

Equipped with a Great Lakes Equipment Company natural gas fired drying oven identified as Emission Unit ID OV-1 and rated at a maximum heat input of 3.2 million Btu per hour.

The sum of air infiltrated into the paint tunnel, all paint tunnel/paint booth emissions and drying oven emissions are directed to Emission Unit ID TX-1 and vented at Stack/Vent ID S-OX. Emission Unit ID TX-1 is a Protectaire Company natural gas fired thermal oxidizer with a maximum heat input of 5.3 million Btu per hour for destruction of Volatile Organic Compounds (VOC) generated from the surface coating operation.

Operation of the Paint Tunnel as a total enclosure, as defined by 40 CFR Part 51 Method 204, while maintaining a minimum thermal oxidizer operating temperature of no less than 1200 F, the overall collection and destruction efficiency of the system for VOC's is rated at 99.7 %. Installed in 1997. Continuous operation of the collection system and thermal oxidizer is necessary in accordance with 326 IAC 8-2-9(d) and/or 326 IAC 8-1-2(b) and (c).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
(2) Paved roads and parking lots with public access.
(3) Anodizing system consisting of between 26 and 36 tanks. Each tank contains one of the following solutions; soap, caustic, anodize, color, sealer, water or deionized water rinse.
(4) Alkaline cleaner, chrome phosphate, citrus acid and rinse tanks and an associated dry off oven for miscellaneous metal parts cleaning in preparation for surface coating application(s).
(5) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr.
(6) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
(7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
(8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
(9) Closed loop heating and cooling systems.
(10) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%.
(11) Heat exchanger cleaning and repair.
(12) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process.
(13) Blowdown for any of the following: sight glass, boiler, compressor, pump or cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

(c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division

Air Quality Management Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and ERMD may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)] [326 IAC 2-8-5(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and ERMD may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation

on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAM
Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD
Telephone No.: 317-327-2234
Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1)hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital

investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B.14 - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

(b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.

(c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM and ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated

before notice of such intent is provided to the Permittee by IDEM, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM and ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

(a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

(b) An administrative permit amendment may be made by IDEM, OAM and ERMD, consistent with the procedures specified under 326 IAC 2-8-10(b).

(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.

(b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F), except as provided by 326 IAC 2-8-11(c).

(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).

(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, and ERMD takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.

(b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

(c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor

permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public

review.

Such records shall consist of all information required to be submitted to IDEM, OAM and ERMD, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.

(c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21).

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordancewith an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) & (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the

property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment (are) in operation, as described in Section D of this permit.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-2.1]

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM,OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days before the intended test date.

(b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and ERMD, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Continuous Monitoring of Oxidizer Temperature [326 IAC 2-8-4] [326 IAC 8-2-5]

A temperature sensing device shall be employed to continuously monitor the thermal oxidizer combustion chamber operating temperature and shall provide a continuous written record such that the expected normal readings shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall insure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary,

including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) asbestos removal or demolition start date;

(B) removal or demolition contractor; or

(3) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Asbestos
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

C.18 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C.8-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenancedid not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the requirements stated in this permit, the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if

received by IDEM, OAM, and ERMD on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Paint Tunnel **Emission Unit ID's B-1, B-2, B-5, B-6, OV-1 and TX-1**	Miscellaneous metal parts surface coating of various sheet metal products conveyed through four (4) paint spray booths contained within a total enclosure Paint Tunnel. The Paint Tunnel is maintained under negative pressure, in relation to the surrounding plant, at a minimum average facial velocity of 200 feet per minute air infiltration into the paint tunnel through all natural draft openings. Volatile Organic Compound (VOC) emissions are controlled by a Thermal Oxidizer. Surface coating in the Paint Tunnel consists of two (2) Binks automated paint spray booths for primer application, identified as Emission Unit ID B-1 and B-2, and two (2) Telkamp manual application booths identified as Emission Unit ID B-5 and B-6 for coatings applications. Electrostatic air atomization is the spray application method. Each Emission Unit ID is equipped with dry filters for over spray and Particulate Matter (PM) control. Combined total maximum surface coating capacity of six (6.0) gallons of primers/coatings per hour at an average conveyor line speed of six (6.0) feet per minute. Installed in 1989. Equipped with a Great Lakes Equipment Company natural gas fired drying oven identified as Emission Unit ID OV-1 and rated at a maximum heat input of 3.2 million Btu per hour. The sum of air infiltrated into the paint tunnel, all paint tunnel/paint booth emissions and drying oven emissions are directed to Emission Unit ID TX-1 and vented at Stack/Vent ID S-OX. Emission Unit ID TX-1 is a Protectaire Company natural gas fired thermal oxidizer with a maximum heat input of 5.3 million Btu per hour for destruction of Volatile Organic Compounds (VOC) generated from the surface coating operation. Operation of the Paint Tunnel as a total enclosure, as defined by 40 CFR Part 51 Method 204, while maintaining a minimum thermal oxidizer operating temperature of no less than 1200 F, the overall collection and destruction efficiency of the system for VOC's is rated at 99.7 %. Installed in 1997. Continuous operation of the collection system and thermal oxidizer is necessary in accordance with 326 IAC 8-2-9(d) and/or 326 IAC 8-1-2(b) and (c).

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(b) & (c)][326 IAC 8-2-9][326 IAC 8-2-4]

(a) Pursuant to 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations), the Permittee shall not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of the following:

(1) Four and three tenths (4.3) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that lacks color or opacity and is transparent and uses the undercoat as a reflectant base or undertone color.

(2) Three and five tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator in a coating applicator system that is air dried or forced warm

air dried at temperatures up to one hundred ninety four (194) degrees Fahrenheit.

(3) Three and five tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to temperatures consistently above ninety five (95) degrees Celsius, detergents, abrasives or scouring agents, solvents, corrosive atmospheres, outdoor weather at all times, or similar environmental conditions.

(4) Three (3.0) pounds per gallon of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

(b) If more than one (1) emission limitation in Section D.1.1a) applies to a specific coating, then the least stringent emission limitation shall be applied.

(c) Pursuant to 326 IAC 8-2-9, solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(d) Pursuant to 326 IAC 2-8-4, VOC emissions from the Paint Tunnel surface coating operations shall not exceed 98.9 tons per rolling 365 consecutive day period. This limitation is equivalent to surface coating application(s) at maximum capacity, operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device of no less than 84.0%.

The operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than eighty four percent (84%) efficiency, as determined by 326 IAC 8-1-2(b) & (c), makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Hazardous Air Pollutants (HAP's) [326 IAC 2-8-4] [326 IAC 20]

Pursuant to 326 IAC 2-8-4 (FESOP: Permit Content) and 326 IAC 20 (Hazardous Air Pollutants);

(a) Any single regulated HAP emissions from the Paint Tunnel surface coating operations shall not exceed 9.4 tons per rolling 365 consecutive day period. This limitation is equivalent to surface coating application(s) at maximum capacity, operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than 84.0% efficiency.

(b) Any combination sum of regulated HAPs emissions from the Paint Tunnel surface coating operations shall not exceed 24.0 tons per rolling 365 consecutive day period. This limitation is equivalent to surface coating application(s) at maximum capacity, operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than 84.0% efficiency.

The operation of a Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than 84.0% efficiency makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from Emission Unit ID B-1, B-2, B-5 and B-6 shall not exceed an allowable PM emission rate of 0.4 pounds per hour

based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for the Paint Tunnel, Emission Unit ID TX-1 and Thermal Oxidizer temperature monitoring and recording.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

1) Compliance with the applicable VOC limit specified in Section D.1.1 shall be determined pursuant to Section D.1.7 and shall be determined by a performance test conducted at least once every five (5) years in accordance with Section C.8 - Performance Testing. Performance testing for VOC emissions shall be conducted no later than May 8, 2002. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

2) Testing of this facility for PM emissions is not specifically required by this permit. However, if testing is required, compliance with the PM limit shall be determined by a performance test conducted in accordance with Section C.8 - Performance testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.1.6 Paint Tunnel Total Enclosure

Determination of a total enclosure, as defined by 40 CFR Part 51 Method 204 , shall be made by each of the following methods:

a) Any natural draft opening must be at least four equivalent diameters from Emission Unit ID B-1, B-2, B-5 and B-6;

b) The total area of all natural draft openings shall not exceed five (5) percent of the surface area of the enclosures four walls, floor and ceiling ;

c) The direction of flow through all natural draft openings shall be in to the Paint Tunnel. The average facial velocity of air through all natural draft openings shall be at least two hundred (200) feet per minute.

d) All Paint Tunnel access doors and windows shall be closed during operation.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2 (b) & (c)]

(a) Compliance with the applicable VOC limit specified in Section D.1.1 shall be determined pursuant to 326 IAC 8-1-2 (General Provisions Relating to VOC Rules: Compliance Methods). The Permittee shall continuously maintain a Paint Tunnel total enclosure, as defined by 40 CFR Part 51 Method 204, and shall continuously operate a thermal oxidizer incinerator identified as Emission Unit ID TX-1 at all times during miscellaneous metal parts surface coating operations in any combination of operating paint spray booths identified as

Emission Unit ID B-1, B-2, B-5 and B-6.

(b) Pursuant to 326 IAC 8-1-2(b) and (c), the overall efficiency of the Paint Tunnel capture system and the thermal oxidizer control device identified as Emission Unit ID TX-1 shall be no less than the equivalent overall efficiency which shall be calculated by the following equation:

$$O = \frac{V - E}{V} \; x \; 100$$

Where: O = Equivalent overall efficiency of the capture and control device as a percentage.

V = The actual VOC content of the coating or if multiple coatings are used, the daily weighted average of VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 (General Provisions Relating To VOC Rules: Testing Procedures) in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent Emission limit in pounds of VOC per gallon of coating solids as applied.

(c) Pursuant to 326 IAC 2-8-4, compliance with Section D.1.1(d) shall be based on daily records of solvent and/or coating usage and through the continuous operation of a total enclosureand thermal oxidizer control device at all times during surface coating operation(s) at an overall capture and control efficiency of no less than the overall efficiency specified by 326 IAC 8-1-2 (b) and (c). IDEM, OAM and/or ERMD reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Hazardous Air Pollutants (HAPs)

Compliance with the applicable HAPs emission limitation specified in Section D.1.2 for any single HAP emission or any combination of HAPs emissions from miscellaneous metal parts surface coating operations in the Paint Tunnel shall be determined pursuant to 326 IAC 8-1-2(b) and (c) and through the continuous operation of a total enclosure and thermal oxidizer control device at an overall capture and control efficiency of no less than 84 % at all times during surface coating operation(s). IDEM, OAM and/or ERMD reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Particulate Matter (PM)

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the

presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.10 Thermal Oxidizer Operating Temperature

(a) Pursuant to 326 IAC 2-8-4, 326 IAC 2-8-5 and Conditions C.9 (Compliance Monitoring) and C.10 (Maintenance of Monitoring Equipment), the Permittee shall install, calibrate and operate a device that continuously provides a written record account of the Thermal Oxidizer operating temperature to achieve compliance with 326 IAC 8-1-2. The Permittee shall maintain such device continuously thereafter.

(b) The Permittee shall continuously record the Thermal Oxidizer operating temperature. A minimum operating temperature of 1200 F shall be maintained at all times during surface coating operation(s). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.11 Thermal Oxidizer Induced Draft Fan Amperage

The amperage on the induced draft fan at Emission Unit ID TX-1 shall be recorded at least once daily when Paint Tunnel surface coating is in operation. The fan amperage shall be maintained within the range of 20 to 23.5 amps. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the fan amperage is outside the specified range.

These monitoring conditions are necessary to ensure that the Paint Tunnel is continuously operated as a total enclosure and that all generated VOC/HAP emissions in the Paint Tunnel are directed to Emission Unit ID TX-1 where they are incinerated. Verification of destruction efficiency is demonstrated by maintaining a minimum operating temperature of no less than 1200 F. By maintaining this operating temperature, greater than 84 % collection and destruction efficiency is verified to be in compliance with the minimum efficiency mandated by 326 IAC 8-1-2(b) and (c) and is verified to be in compliance with FESOP HAP limitations mandated by Condition D.1.2.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.10 and D.1.11, the Permittee shall maintain daily records of the following information:

(1) The weight of VOC per volume of coating solids as applied each day on each coating line;

(2) Thermal Oxidizer continuous operating temperature monitoring data,

(3) A log of Thermal Oxidizer induced draft fan amperage daily data;

(4) The cleanup solvent usage for each day;

(5) The total VOC/HAP usage for each day;

(6) A log of operating time for the capture and control device(s), monitoring equipment and the associated coating line(s);

(7) A maintenance log for the capture system, control device and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages ; and

(8) A three hundred and sixty five (365) day rolling sum of the weight of VOC/HAPs emitted.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C.20 - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information necessary to document compliance with Condition D.1.1 and Condition D.1.2 shall be submitted to the address(es) listed in Section C.20 - General Reporting Requirements, of this permit, using the Quarterly Compliance Report Form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Insignificant Activities

6.3 million Btu per hour Boiler - Natural gas fired - less than 10 million Btu per hour

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, PM emissions from the 6.3 million Btu per hour boiler shall be limited to 0.6 pounds per million Btu of heat input.

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Aluminum Finishing Corporation
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP No.: F097-8345-00127

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

□ Annual Compliance Certification Letter

□ Emergency/Deviation Occurrence Reporting Form

□ Test Result (specify) _____

□ Report (specify) _____

□ Notification (specify) _____

□ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Aluminum Finishing Corporation
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th Street, Indianapolis, Indiana 46229
Part 70 Permit No.: F097-8345-00127

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
☐ 1. This is an emergency as defined in 326 IAC 2-7-1(12) •The Permittee must notify ERMD and the Office of Air Management (OAM), within four (**4**) business hours (ask for Compliance Section); and •The Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (**2**) days, and follow the other requirements of 326 IAC 2-8-12
☐ 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) •The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY COMPLIANCE REPORT

Source Name: Aluminum Finishing Corporation
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP No.: F097-8345-00127

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement	Number of Deviations	Date of each Deviations	No Deviations
Conditions D.1.1 and D.1.2 Continuously maintain84 % overall efficiency (Thermal Oxidizer operating temperature of no less than 1200 F during surface coating operation(s)).			
Conditions D.1.1 and D.1.2 Continuously maintain a total enclosure (Thermal Oxidizer induced draft fan within 20 to 23.5 amps)			

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Office of Air Management
and
City of Indianapolis
Environmental Resources Management Division

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name:	**Aluminum Finishing Corporation**
Source Location:	**9850 East 30th Street, Indianapolis, Indiana 46229**
County:	**Marion**
SIC Code:	**3479**
Operation Permit No.:	**F097-7881-00127**
Permit Reviewer:	**M. Caraher**

The City of Indianapolis Environmental Resources Management Division (ERMD) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Aluminum Finishing Corporation relating to the fabrication, anodizing and surface coating of architectural metal products.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) Miscellaneous metal parts surface coating of various sheet metal products conveyed through four (4) paint spray booths contained within a total enclosure Paint Tunnel. The Paint Tunnel is maintained under negative pressure, in relation to the surrounding plant, at a minimum average facial velocity of 200 feet per minute air infiltration into the paint tunnel through all natural draft openings. Volatile Organic Compound (VOC) emissions are controlled by a Thermal Oxidizer.

Surface coating in the Paint Tunnel consists of two (2) Binks automated paint spray booths for primer application, identified as Emission Unit ID B-1 and B-2, and two (2) Telkamp manual application booths identified as Emission Unit ID B-5 and B-6 for coatings applications. Electrostatic air atomization is the spray application method. Each Emission Unit ID is equipped with dry filters for over spray and Particulate Matter (PM) control. Combined total maximum surface coating capacity of six (6.0) gallons of primers/coatings per hour at an average conveyor line speed of six (6.0) feet per minute. Installed in 1989.

Equipped with a Great Lakes Equipment Company natural gas fired drying oven identified as Emission Unit ID OV-1 and rated at a maximum heat input of 3.2 million Btu per hour.

The sum of air infiltrated into the paint tunnel, all paint tunnel/paint booth emissions and drying oven emissions are directed to Emission Unit ID TX-1 and vented at Stack/Vent ID S-OX. Emission Unit ID TX-1 is a Protectaire Company natural gas fired thermal oxidizer with a maximum heat input of 5.3 million Btu per hour for destruction of Volatile Organic

Compounds (VOC) generated from the surface coating operation.

Operation of the Paint Tunnel as a total enclosure, as defined by 40 CFR Part 51 Method 204, while maintaining a minimum thermal oxidizer operating temperature of no less than 1200 F, the overall collection and destruction efficiency of the system for VOC's is rated at 99.7 %. Installed in 1997. Continuous operation of the collection system and thermal oxidizer is necessary in accordance with 326 IAC 8-2-9(d) and/or 326 IAC 8-1-2(b) and (c).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during the review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
(2) Paved and unpaved roads and parking lots with public access.
(3) Anodizing system consisting of between 26 and 36 tanks. Each tank contains one of the following solutions; soap, caustic, anodize, color, sealer, water or deionized water rinse.
(4) Alkaline cleaner, chrome phosphate, citrus acid and rinse tanks and an associated dry off oven for miscellaneous metal parts cleaning in preparation for surface coating application(s).

Existing Approvals

This source has been operating under the following approvals:

(1) CP870127-01 issued on April 9, 1987.

Enforcement Issue

Since the date of the initial filing of the FESOP Application, December 13, 1996, the source has completed the required tasks of a Consent Decree with the United States Department of Justice. The Consent Decree was for ongoing violation of 326 IAC 8-2-9(d) Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations which has been incorporated as a Federally enforceable SIP limitation. 326 IAC 8-2-9(d) requires miscellaneous metal parts surface coating operations with actual VOC emissions of fifteen (15) pounds per day or greater to not cause, allow or permit the discharge into the atmosphere of any VOC in excess of 3.5 pounds of VOC per gallon of coating less water. The source continues to spray apply coatings in excess of 3.5 pounds of VOC per gallon of coating less water but has verified compliance by utilizing the equivalent limitation allowed in 326 IAC 8-1-2(a)(2) and 326 IAC 8-1-2(b) and (c). Compliance with 326 IAC 8-2-9(d) is achieved with the installation and operation of a total enclosure (the Paint Tunnel) and a thermal oxidizer at an overall collection and destruction efficiency for VOC's of 99.7 %. Compliance was demonstrated by stack testing May 8, 1997 per the Consent Decree and per 40 CFR Part 60 Methods 1 through 4, 25 and 25 A for destruction efficiency and 40 CFR Part 51 Method 204 for the

verification of a total enclosure. The Consent Decree requires continued operation of the total enclosure and thermal oxidizer to ensure continued compliance with 326 IAC 8.

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on June 6, 1997 with the submittal of a report regarding total enclosure, VOC stack testing and overall collection and destruction efficiency.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (Pages 1 through 7).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

(For each pollutant listed below the total Potential Emissions from all facilities are added together)

Pollutant	Potential Emissions (tons/year)
PM	25.9
PM-10	25.9
SO_2	0.0
VOC	162.6
CO	0.8
NO_x	3.7

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

See attached spreadsheets for detailed calculations (Appendix A Pages 1 through 7).

HAP	Potential Emissions (tons/year)
Toluene	37.5
Dimethyl Phthalate	28.9
Xylene	27.7
Glycol Ethers	25.5
Methyl Isobutyl Ketone	10.5
Ethyl Benzene	6.5
Methyl Ethyl Ketone	6.6
Trimethylbenzene	5.3

TOTAL	148.5

See attached spreadsheets for detailed calculations (Appendix A Pages 1 through 7).

(a) The potential emissions (as defined in the Indiana Rule) of Volatile Organic Compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

(a) The source has accepted a federally enforceable limit on potential to emit VOC of 99 tons per year, consisting of:

(i) 98.9 tons per year for the significant activities; and

(ii) 0.1 tons per year for the insignificant activities.

b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

The permit contains provisions that allow the source to use daily records to document compliance with limitations that correspond to 99 tons.

(c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs

Paint Tunnel consisting of Emission Unit ID B-1, B-2, B-5, B-6 Drying Oven termed Emission Unit ID OV-1 and Thermal Oxidizer-Emission Unit ID TX-1	25.5	25.5	0.0	98.9	0.8	3.7	9.4 tons any single HAP; 24.0 tons any combination of HAPs
Insignificant Activities (Boiler)	0.3	0.3	0.0	0.1	0.6	2.8	0.0
Total Emissions	25.8	25.8	0.0	99.0	1.4	6.5	9.4 / 24.0

Attached Table (1) summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
TSP	nonattainmen
PM-10	unclassifiable
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6 Malfunctions

The source is initially subject to 326 IAC 1-6 because it is required to obtain a permit under 326 IAC 2 Permit Review Rules. However, 326 IAC 1-6 emergency or upset provisions are superseded by 326 IAC 2-8-12 which requires the source to report verbally within four (4) business hours any emergency which results in an increase of an emission limitation or violation of an applicable rule. A written excess emissions report is required to be submitted within two (2) working days of any such occurrence. Records of all such occurrences are to be retained at the source for a period of three (3) years from the date of such occurrence(s) and shall be made available to IDEM,OAM and/or ERMD upon request.

326 IAC1-6-3 Malfunctions: Preventive Maintenance (PM) Plans and 326 IAC 2-8-3

Any person responsible for operating any facility specified in 326 IAC 1-6 shall prepare and maintain a Preventive Maintenance Plan which includes the following information:

1) Identification of the individual(s) responsible for inspecting, maintaining and repairing emission control device(s).

2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

3) Identification and quantification of the replacement parts which will be kept in inventory and made available for quick replacement.

PM Plans shall be submitted to IDEM,OAM and/or ERMD upon request and shall be subject to review and approval by IDEM,OAM and/or ERMD.

326 IAC 1-7 Stack Height Provisions

All sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter (PM) are emitted and for which construction commenced after June 19, 1979 shall be constructed using good engineering practice (GEP) stack height. The paint booths, at maximum capacity and an estimated transfer efficiency of 75%, have combined uncontrolled potential to emit PM of 25.1 tons per year (see Appendix A Page 3 of 7). With the use of dry filters at an estimated 95% PM control efficiency, actual emissions at maximum capacity and 8760 hours of operation are, approximately, 1.25 tons per year. 326 IAC 1-7-5 specifically exempts sources from the GEP stack height requirement if actual emissions (after controls) are less than 25 tons per year.

326 IAC 2-6 Emission Reporting

This source is subject to 326 IAC 2-6 Emission Reporting, because it has the potential to emit more than ten (10) tons per year of VOC in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-1 State Construction and Operating Permits; Rule Applicability

The source is required, by 326 IAC 2-1, to obtain an operating permit for four (4) paint spray booths because potential VOC emissions exceed 25 tons per year. Because PTE, prior to the issuance of a FESOP, exceeds 100 tons per year of VOC, the source is electing to obtain a FESOP under 326 IAC 2-8 Federally Enforceable State Operating Permit (FESOP) Program.

The source had initially been issued a Construction Permit (Permit # CP870127-01) under the provisions of 326 IAC 2-1 on April 9, 1987 for an electrostatic air spray paint line. The Construction Permit limited the facility to 24.9 tons of VOC per year. At that time, miscellaneous metal parts surface coating operations did not have an applicable VOC content limitation per gallon of coating less water unless potential exceeded 25 tons per year. 326 IAC 8 rules were amended in 1989 lowering the applicability threshold of VOC content limitations to sources who had actual VOC emissions in excess of 15 pounds per day. Federal Potential to Emit VOC and HAPs has been determined to be in excess of the applicable major source threshold(s).

326 IAC 2-8 Federally Enforceable State Operating Permit (FESOP) Program

The source has actual VOC emissions (with control) of less than one hundred (100) tons per year, actual HAP's emissions (with control) of less than twenty five (25) tons per year combined HAP's emissions and has less than ten (10) actual tons per of any single HAP. Aluminum Finishing Corporation elects to obtain a FESOP under 326 IAC 2-8 to enforceably limit PTE to below major source thresholds.

326 IAC 5-1 Visible Emissions Limitations

Pursuant to 326 IAC 5-1-2 Visible Emissions Limitations, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

<u>Emission Unit ID B-1, B-2, B-5, B-6 and TX-1 (Paint Tunnel and Thermal Oxidizer)</u>

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the company from the May 8, 1997 stack testing and subsequent calculations made (see Appendix A Pages 1 and 2 of 7), coatings applied in each Emission Unit ID exceed 3.5 pounds of VOC per gallon of coating less water. The source has installed add on

pollution control equipment in the form of a total enclosure and a thermal oxidizer, the Paint Tunnel and Emission Unit ID TX-1, and appears to demonstrate compliance with the applicable VOC content limitation by employing a compliance method found in 326 IAC 8-1-2(a)(2) and an equivalent limitation outlined in 326 IAC 8-1-2(b) and (c).

326 IAC 8-1-2 (General Provisions Relating to VOC Rules: Compliance Methods)

Pursuant to 326 IAC 8-1-2 (General Provisions Relating to VOC Rules: Compliance Methods), the source is allowed to employ add on pollution control equipment to meet an equivalent emission limitation to 326 IAC 8-2-9. Aluminum Finishing installed a thermal oxidizer in 1997 with natural gas firing as an auxiliary fuel in order to achieve compliance with 326 IAC 8. In utilizing add on control, the source must then meet an equivalent limitation set by 326 IAC 8-1-2(b) and (c). Based upon emission calculations performed (see Appendix A Page 3 of 7), the overall collection and destruction efficiency must meet a minimum of 79.8% efficiency. Method 204 total enclosure testing was performed May 8, 1997 to determine if the Paint Tunnel could be deemed a total enclosure. Testing found that the Paint Tunnel met all the minimum requirements to be deemed a total enclosure with 100 % capture. Method 25 and 25A stack testing of VOC emissions on May 8, 1997 at the oxidizer inlet and outlet found that the actual overall capture and destruction efficiency of the system was 99.7% at an operating temperature of 1200 F. In addition, controlled emissions during the test were found to be 0.03 lbs of VOC per hour (0.15 tons VOC per year at 8760 hours of operation per year). At maximum capacity (1500 units per hour and 0.004 gallons per unit - 6.0 gallons per hour) and 99.7% efficiency, VOC emissions are estimated to be 0.5 tons per year. If an overall efficiency of 79.8% is set as the minimum overall efficiency of the system, per 326 IAC 8-1-2(b) and (c), VOC emissions at maximum capacity would be, approximately, 32.8 tons per year and combined HAPs emissions would exceed 25tons per year (see Appendix A Page 3 of 7). Therefore, the minimum overall efficiency, per 326 IAC 2-8, will be set in the FESOP at 84% in order to have VOC emissions less than 100 tons per year, combined HAPs emissions less than 25 tons per year and any single HAP emission(s) less than 10 tons per year (see Appendix A Page 3 of 7). No FESOP coating, VOC or HAP throughput limitation will need to be imposed in the FESOP if overall capture and destruction efficiency is equal to or greater than 84%. As long as a minimum Thermal Oxidizer operating temperature of 1200 F is monitored and maintained and record keeping is performed to verify this minimum temperature, the capture and destruction efficiency is assumed to meet or exceed 84%.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 the particulate matter (PM) overspray from the Emission Unit ID B-1, B-2, B-5 and B-6 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Where P = the maximum process rate of all coatings delivered to the applicator which has been determined to be 0.03 tons per hour (9.62 lbs coat/gal coat x 6.0 gallons coat/hr x ton/2000 pounds), E shall be limited to 0.4 pounds of PM per hour. Uncontrolled PM emissions at maximum capacity and an estimated transfer efficiency of 75% for electrostatic air atomization have been calculated to be 5.7 pounds of PM per hour. Utilizing dry filters as overspray control at 95% efficiency, calculated maximum actual PM emissions are estimated to be 0.3 pounds per hour. Therefore, the use of dry filters is necessary to meet the limitation set in 326 IAC 6-3-2.

Emission Unit ID Boiler - Insignificant Activity

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the 6.3 million Btu per hour natural gas fired boiler identified as Emission Unit ID Boiler shall be limited to 0.6 pounds of particulate matter per million Btu heat input. Utilizing AP-42 emission factors for commercial natural gas fired boilers, actual PM emissions are estimated to be 0.012 pounds per million Btu (12 # PM/MMCF x 1 MMCF/1000 MMBtu = 0.012 pounds/MMBtu) which appears to be in compliance with 326 IAC 6-2-4. Because the boiler was installed prior to 1989 and is less than 10 million Btu per hour, 40 CFR Part 60 Subpart Dc (New Source Performance Standard) does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs ERMD and IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The Paint Tunnel and Emission Unit ID B-1, B-2, B-5, B-6 and TX-1 have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps, in accordance with Section C.15 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the

Preventive Maintenance Plan.

(d) The Permittee shall continuously record the operating temperature of the Thermal Oxidizer, Emission Unit ID TX-1. A minimum operating temperature of 1200 F shall be maintained. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the exhaust temperature reading is below the above mentioned range.

(e) The amperage on the induced draft fan at Emission Unit ID TX-1 shall be recorded at least once daily when Paint Tunnel surface coating is in operation. The fan amperage shall be maintained at the manufacturer's minimum specified rating. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the fan amperage is below the manufacturer's minimum specified rating.

These monitoring conditions are necessary to ensure that the Paint Tunnel is continuously considered to be a total enclosure and that all generated VOC emissions in the Paint Tunnel are directed to Emission Unit ID TX-1 where they are incinerated. Verification of destruction efficiency is demonstrated by maintaining the minimum exhaust temperature observed during the May 8, 1997 stack test of 1200 F. By maintaining this exhaust temperature, greater than 84 % collection and destruction efficiency is verified in compliance with the minimum efficiency mandated by 326 IAC 8-1-2(b) and (c).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

(b) See attached calculations for detailed air toxic calculations (Appendix A Pages 3, 4 and 7 of 7).

(c) Per IDEM guidance, if a source has Potential to Emit a HAP or combined HAP's above major source thresholds but has taken an enforceable limitation per 326 IAC 2-8, air toxics screening modeling utilizing SCREEN3 shall be conducted utilizing the restricted limitation. Screening modeling for toluene revealed no exceedance of any OSHA PEL for this HAP. Refer to Appendix A Page 7 of 7 for screening modeling input values and results.

Conclusion

The operation of this miscellaneous metal parts surface coating operation will be subject to the conditions of the attached proposed **FESOP No. F097-7881-00127.**

Table (1)

Stack/Vent ID: S-OX			
Stack/Vent Dimensions: Ht: 38 feet Dia: 30" Temp: > 1200 F Flow: > 6300 dscfm			
Emission Unit: Paint Tunnel, B-1, B-2, B-5, B-6 and TX-1			
Date of Construction: 1989/1997			
Alternative Scenario: none			
Pollution Control Equipment: Thermal Oxidizer - Emission Unit ID TX-1			
General Description of Requirement:	PM	VOC	HAPs
Numerical Emission Limit:	E = 4.1P^0.67	Overall > 84% capture/destruction efficiency; < 98.9 tpy	9.4 tpy / 24.0 tpy
Regulation/Citation:	326 IAC 6-3-2	326 IAC 8-1-2(b) & (c)	326 IAC 2-8
Compliance Demonstration:	use of dry filters; stack test	1200 F @ TX-1	1200 F @ TX-1
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:	none	VOC; capture/destruction efficiency; TX-1 operating temperature	none
Testing Method/Analysis:	none	EPA reference	none
Testing Frequency/Schedule:	none	as needed	none
Submittal of Test Results:	none	as needed	none
COMPLIANCE MONITORING			
Monitoring Description:	none	temperature; fan amperage	temperature; fan amperage
Monitoring Method:	none	strip chart; visual	strip chart; visual
Monitoring Regulation/Citation:	none	326 IAC 2-8	326 IAC 2-8
Monitoring Frequency:	none	continuous; once daily	continuous; once daily
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	none	VOC consumption; temperature/fan amperage	HAPs consumption; temperature/amperage
Recording Frequency:	none	daily	daily
Submittal Schedule of Reports:	none	quarterly	quarterly
REPORTING REQUIREMENTS			
Information in Report:	none	temperature/fan amperage	temperature/fan amperage
Reporting Frequency/Submittal:	none	quarterly	quarterly

Additional Comments:	none	none	none

Office of Air Management
and
City of Indianapolis
Environmental Resources Management Division

Addendum to the
Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Aluminum Finishing Corporation**
Source Location:	**9850 East 30th Street, Indianapolis, Indiana 46229**
County:	**Marion**
SIC Code:	**3479**
Operation Permit No.:	**F097-7881-00127**
Permit Reviewer:	**M. Caraher**

On December 12, 1997, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper in Indianapolis, Indiana, stating that Aluminum Finishing Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) to surface coat miscellaneous metal parts under an SIC of 3479 with operation of a total enclosure and a thermal oxidizer in order to achieve compliance with 326 IAC 8. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

During the thirty (30) day public notice period ERMD received written comments from Aluminum Finishing Corporation and the Indiana Department of Environmental Management. IDEM commented January 14, 1998 with the submittal of a new draft FESOP model to the local agency (ERMD) and with guidance that the any draft FESOP, even one currently on public notice, should have these updated revisions to the draft FESOP. All of IDEM's comments pertain to the incorporation of the language of the latest (1/14/98) FESOP model.

ERMD response to these paraphrased comments are stated below along with the following changes to the FESOP:

Table of Contents Comments/Changes

Comment # 1: Per IDEM, B.1 (Permit No Defense) rule cite changed from [IC 13-15][IC13-17] to [326 IAC 2-1-10][IC 13].

Response: Latest rule citation [326 IAC 2-1-10][IC 13] replaces the previous rule cite for Section B.1 in the Table of Contents.

Section A Comments/Changes

Comment # 2: ERMD requested in an RAI letter dated October 9, 1997 that an updated Insignificant Activity list, per the current GSD Form 10(a), should be submitted. January 14, 1998, Aluminum Finishing submitted an updated GSD Form 10(a) along with the statement that

there are no unpaved areas at the plant which would effect the accuracy of Section A.3(2) Paved and unpaved roads and parking areas with public access.

Response: The updated Insignificant Activity listing does not contain any units that would appear to have any applicable emission limitations. Per the updated GSD Form 10(a) and the requested revision to Section A.3(2), the following revision and additions were made to the Insignificant Activity listing in Section A.3 Insignificant Activities:

(2) Paved roads and parking areas with public access.
(5) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr.
(6) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
(7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
(8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
(9) Closed loop heating and cooling systems.
(10) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%.
(11) Heat exchanger cleaning and repair.
(12) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process.
(13) Blowdown for any of the following: sight glass, boiler, compressor, pump or cooling tower.

Section B Comments/Changes

Comment # 3: Per IDEM, Condition B.12(a) Annual Compliance Certification should have the statement "... certify that the source has complied..." replaced with "...submit a compliance certification report which addresses the status of the source's compliance..."

Response: Per IDEM guidance the revised language was inserted in to Condition B.12(a) Annual Compliance Certification. The revised condition now states;

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Section C Comments/Changes

Comment # 4: Aluminum Finishing Corporation commented that Condition C.1 (b) Overall Source Limit should add the word "not" to the last line of C.1(b) to state "...to emit does not exceed the above specified limits."

Response: The draft FESOP model language was inadvertently modified. Condition C.1(b) has been revised and now states:

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21).

Comment # 5: IDEM stated that Condition C.2 Opacity should have removed the statement "This condition is not Federally Enforceable."

Response: The statement "This condition is not Federally Enforceable" has been deleted from Condition C.2 Opacity.

Comment # 6: IDEM stated that Condition C.3 Open Burning should have the statement "This condition is not federally enforceable" replaced with "326 IAC 4-1-3(a)(2)(A) & (B) are not federally enforceable."

Response: Per IDEM guidance, the revision has been made. The new Condition C.3 Open Burning now states:

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) & (B) are not federally enforceable.

Comment # 7: Per IDEM guidance, Condition C.4 Incineration should have the statement "This condition is not federally enforceable" removed.

Response: Per IDEM guidance, the revision to Condition C.4 Incineration has been made. The new Condition C.4 states:

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

Comment # 8: Per IDEM, Condition C.20 General Reporting Requirements part (a) and (b) have been revised and the remainder of the Condition has been relettered.

Response: Per IDEM guidance, the revision to Condition C.20 General Reporting Requirements has been made. The new Condition C.20 General Reporting Requirements states:

(a) To affirm that the source has met all the requirements stated in this permit, the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must

be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Section D Comments/Changes

Condition D.1.6(c) and Condition D.1.11

Comment # 9: With the October 9, 1997 RAI, ERMD requested the thermal oxidizer induced draft fan amperage range that would guarantee the manufacturer's optimum fan performance. The draft FESOP was public noticed with the statement " The fan amperage shall be maintained at the manufacturer's minimum specified rating." It was the intent that the manufacturer's minimum specified range would be known by the time the public comment period expired. However, no such data was available. Aluminum Finishing commented January 14, 1998 that they may want to change the compliance determination for a total enclosure by use of the static pressure differential inside versus outside the enclosure. This was because preliminary checks of the fan amperage found that it was sensitive to outside air temperature fluctuations and may vary as much as 0.5 amps per 10°F change. However, in subsequent conversations, it was agreed that the fan amperage range, for the purpose of this FESOP issuance, should be between 20 and 23.5 amps.

Response: Condition D.1.6(c) Paint Tunnel Total Enclosure has the wording " The fan amperage shall be maintained at the manufacturer's minimum specified rating." The fan amperage checks are performed as a monitoring parameter to approximate a minimum of 200 feet per minute as a face velocity through all natural draft openings for the total enclosure. Upon further review, this wording should not be a Compliance Determination condition, but it should remain as a Compliance Monitoring condition. The compliance determination for a total enclosure is currently stated in Condition D.1.6 as the EPA Reference Method found in 40 CFR Part 51 Method 204 and shall remain as Condition D.1.6. However, the reference to fan amperage in Condition D.1.6(c) has been deleted. The section of Condition D.1.6(c) that has been deleted is:

"Compliance with the average facial velocity of air through all natural draft openings shall be determined by recording daily the Thermal Oxidizer induced draft fan amperage. The fan amperage shall be maintained at the manufacturer's minimum specified rating. The Preventive Maintenance Plan for Emission Unit ID TX-1 shall contain troubleshooting contingency and corrective actions for when the fan amperage is outside the specified range."

Condition D.1.11 Thermal Oxidizer Induced Draft Fan Amperage is a Compliance Monitoring condition. The induced draft fan amperage range of 20 to 23.5 amps replaces the wording of the manufacturer's minimum specified rating. Condition D.1.11 Thermal Oxidizer Induced Draft Fan Amperage now states:

"The amperage on the induced draft fan at Emission Unit ID TX-1 shall be recorded at least once daily when Paint Tunnel surface coating is in operation. The fan amperage shall be maintained within the range of 20 to 23.5 amps. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the fan amperage is outside the specified range."

Reporting Forms

Comment # 10: Aluminum Finishing indicated, that for the purposes of this FESOP issuance, the fan amperage range to monitor for a total enclosure should be 20 to 23.5 amps. The Quarterly Compliance Report which appeared on page 37 of the public noticed FESOP contained language that the fan amperage should be maintained within the manufacturer's minimum specified rating.

Response: The Quarterly Compliance Report Form has been revised to state the fan amperage range to guarantee a total enclosure. The new Report Form on Page 37 updates this change. The new form is:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE REPORT

Source Name: Aluminum Finishing Corporation
Source Address: 9850 East 30th Street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP No.: F097-8345-00127

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement	Number of Deviations	Date of each Deviations	No Deviations
Conditions D.1.1 and D.1.2 Continuously maintain 84 % overall efficiency (Thermal Oxidizer operating temperature of no less than 1200 F during surface coating operation(s)).			

Conditions D.1.1 and D.1.2 Continuously maintain a total enclosure (Thermal Oxidizer induced draft fan within 20 to 23.5 amps)			

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Technical Support Document

Comment # 11: IDEM has previously commented that all Addendums to Technical Support Documents should restate the Limited Potential to Emit Table following any revision(s) to the FESOP or Technical Support Document. No changes to the Limited PTE Table have occurred. The Limited PTE Table is restated and is:

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Paint Tunnel consisting of Emission Unit ID B-1, B-2, B-5, B-6 Drying Oven termed Emission Unit ID OV-1 and Thermal Oxidizer-Emission Unit ID TX-1	25.5	25.5	0.0	98.9	0.8	3.7	9.4 tons any single HAP; 24.0 tons any combination of HAPs
Insignificant Activities (Boiler)	0.3	0.3	0.0	0.1	0.6	2.8	0.0
Total Emissions	25.8	25.8	0.0	99.0	1.4	6.5	9.4 / 24.0

APPENDIX A

Air Toxic Calculations

Facility Name: Aluminum Finishing Corporation
Location: 9850 East 30th Street, Indianapolis, IN 46229
Permit No.: F097-7881-00127
Permit Reviewer: Mark Caraher

Air Toxic Emissions

Pollutant	Rate (lb/hr)	Rate @ 8760 hr/yr (ton/yr)	Rate @ ?hr/yr (ton/yr)	Modeled Concentration (ug/m3)	OSHA PEL (ug/m3)	% OSHA PEL
toluene	2.05	9		41.17	379960	0.01
Total		9.02				

Note: toluene ceiling value is 100 ppmv in air which equates to 379,960 ug/m3

Air Toxic Stack/s

Stack ID	Height (feet)	Diameter (feet)	Flow Rate (dscfm)	Temperature (F)
S-OX	38	2.5	6500	800